



November 23, 2020

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk and Executive Officer
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Re: Actions in Response to COVID-19
Docket No. 2020-106-A

Dear Ms. Boyd:

Blue Granite Water Company ("Blue Granite" or "the Company") hereby provides the Public Service Commission of South Carolina ("the Commission") with an update on the Company's planned return to normal operations in the wake of the COVID-19 pandemic. With the issuance of Commission Order No. 2020-374, the Company understands that suspensions of disconnections for non-payment and imposition of late fees may be lifted. In comments filed in this Docket on May 22, 2020, the Company informed the Commission that it would provide advance notice to customers regarding the resumption of certain normal business practices, including resuming disconnections and reinstituting late payment and any other customer-related fees. This letter serves as notification to the Commission that Blue Granite Water Company has provided notice to customers via direct mailing during the week of July 27, 2020, along with a concurrent press release, and again via bill inserts during September 2020 of the Company's intention to delay the resumption of normal collections practices through the end of 2020. The Company hereby informs the Commission of its intent to resume its normal billing and collection practices effective **January 1, 2021**. Any customer bill issued on or after January 1, 2021, would be subject to standard due dates, notices of past-due balances, and potential for disconnection or late payment fees. As a result, no service disconnections for non-payment will occur before February 8, 2021. Blue Granite Water Company is committed to working with our customers and providing opportunities to aid in this transition as South Carolina makes continued progress in overcoming COVID-19.

OPERATIONS

As of March 10, 2020, the Company suspended its collection processes, including the assessment of late charges; suspension of disconnections and the issuance of disconnect notices; and reconnection of customers whose service was terminated for non-payment between March 1, 2020, and March 10, 2020. Shortly thereafter, the Company initiated a "work from home" mandate for team members not required to be present in offices and suspended non-essential travel. The Company has pledged to continue this policy through March 31, 2021. The Company's Essential Operations Continuity Plan that outlines policy and provides guidance to field employees who are required to maintain social distancing and other essential safety protocols will continue for the foreseeable future.



As disconnect notices, service terminations, and subsequent reconnections resume, the Company anticipates a significant increase of service orders for field personnel compared to pre-COVID-19 levels. The Company has reviewed the level and volume of past-due accounts and will temporarily increase the outstanding balance threshold above which service is disconnected. This will both minimize impacts on customers by de-prioritizing the disconnection of accounts with lower outstanding balances, as well as manage the strain on existing operations and Customer Experience employees. Over the next few months, the Company will monitor the flow of service orders, payment arrangements/plans created, and impact to customers, as well as continue to adjust the threshold for disconnection as appropriate.

CUSTOMER SERVICE AND COMMUNICATIONS

Throughout the pandemic, the Company has consistently communicated to customers the importance of establishing a **deferred payment arrangement** or **payment plan** if they may not be able to stay current on their water and sewer bills.

- A **payment plan** is an agreement with a customer to make a specified payment by a specified date. For example, a customer may agree to pay a balance ten days beyond the bill's due date.
- A **deferred payment arrangement** is an agreement with a customer to pay off their balance in combination with future bills, in which installments are reflected on monthly customer bills.

Blue Granite Water Company continues to encourage customers to establish payment plans or payment arrangements that best meets their needs. Payment arrangements of 12-months are offered, consistent with Order No. 2020-344 issued in this Docket, though different terms are available if requested by the customer and are approved on a case-by-case basis. Customers are required to pay the first installment when establishing a payment arrangement. No customer on a payment arrangement or plan who is current on that arrangement will be disconnected.

Beyond the aforementioned previous means of communicating the benefits of payment arrangements and plans, customers will be notified December 2020 of the resumption of normal billing practices, the option of payment arrangements and plans, and where to find assistance if necessary, via bill insert, bill message, e-mail, mobile app, website, and social media updates. The Company is also contacting Homeowner's Associations in its service territory to broaden the reach of its messaging. The Company is preparing a new feature enabling payment arrangements to be established using its mobile app, which should be available in the near future. Further, consistent with Order No. 2020-374, the Company will continue its practice of referring customers who are unable to make payments to non-profits within the State, such as the Salvation Army or United Way as well as 211.org, which connects customers to local community agencies providing a wide range of assistance.

Blue Granite considers a service disconnection to be a last resort. That is why the Company has delayed resumption of collection processes, while offering payment assistance to customers who have been unable to keep their accounts current.



CONCLUSION

Blue Granite acted swiftly in early March, proactively initiating various operations and policy changes to protect its customers, employees, and the communities it serves. Blue Granite Water Company has maintained regular communication with ORS staff throughout the pandemic, providing updates on customer balances, payment arrangements, noticing and communication efforts, and other impacts. These consistent interactions have been valuable in providing the Company an opportunity to discuss its plans and proposals in detail and obtain feedback and guidance. The Company will continue communicating its actions and status to ORS and the Commission as COVID-19's impacts evolve. The Company appreciates the opportunity to keep the Commission informed of its actions and plans responding to the pandemic.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald H. Denton III". The signature is fluid and stylized, with a large loop at the beginning and a horizontal line at the end.

Donald Denton III
President, Atlantic Business Unit
Corix Regulated Utilities

cc via email: Parties of Record